

FILED

JAN 23 2006

United States District Court

NORTHERN **DISTRICT OF** **CALIFORNIA**

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

PAUL CHARLES STEEVES

CRIMINAL COMPLAINT**WDB**

CASE NUMBER:

4 . 0 6 - 7 0 0 3 2

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 12/29/05 to 01/20/06 in Alameda (and elsewhere) county, in the

Northern District of California defendant(s) did, (Track Statutory Language of Offense)

- (1) transmit in interstate or foreign commerce a communication containing a threat to injure the person of another; and
(2) engage in conduct with intent to convey false or misleading information under circumstances where such information may reasonably be believed and where such information indicates that an activity has taken, is taking, or will take place that would constitute a violation of, among others, Chapter 10 of Title 18 (related to Biological Weapons)

in violation of Title 18 United States Code, Section(s) 875(c) and 1038(a)

I further state that I am a(n) Special Agent of the FBI and that this complaint is based on the following
Official Title

facts:

See Affidavit of Special Agent Jennifer C. Burnett, attached hereto and incorporated herein.

MAXIMUM PENALTIES: 5 YEARS IMPRISONMENT, \$250,000 FINE, 3 YEARS OF SUPERVISED RELEASE, \$100 SPECIAL ASSESSMENT.

PROCESS REQUESTED: NO BAIL ARREST WARRANT

Continued on the attached sheet and made a part hereof:

☒ Yes☐ No

Approved
As To
Form:

AUSA: Monica Fernandez

Name/Signature of Complainant:

SA Jennifer C. Burnett

Sworn to before me and subscribed in my presence,

January 23, 2006

Date

at

San Francisco, California

City and State

Honorable Joseph C. Spero
United States Magistrate Judge

Name & Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

A. Agent's Experience and Basis for Knowledge

1. I, Jennifer C. Burnett, am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since June, 1996. I am currently assigned to the Domestic Terrorism squad at the FBI Oakland office. I submit this affidavit in support of a criminal complaint and arrest warrant for Paul Charles Steeves. I submit that, based upon the information contained in this affidavit, there is probable cause to believe that Steeves has violated Title 18, United States Code, Section 875(c) (transmitting a threat in interstate commerce), and Title 18, United States Code, Section 1038(a) (conveying false information or hoaxes).
2. The information contained in this affidavit is a result of an investigation conducted by your affiant, and information as related to your affiant by other law enforcement officers and witnesses. Your affiant was a part of this entire investigation, and as such, is aware of the incidents described in this affidavit through participation, reports generated, and conversations with officers from other agencies, including Santa Cruz Police Department, Santa Cruz County Sheriff's Office, United States Postal Inspection Service, Federal Protective Service, and other FBI agents.

B. Criminal Statutes

3. Title 18, United States Code, Section 875(c), makes it a crime to transmit in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.
4. Title 18, United States Code, Section 1038(a), makes it a crime to engage in any conduct with intent to convey false or misleading information under circumstances where such information may reasonably be believed and where such information indicates that an activity has taken, is taking, or will take place that would constitute a violation of, among others, Chapter 10 of Title 18. Chapter 10 of Title 18 is dedicated to Biological Weapons. Title 18, United States Code, Section 175(a) prohibits, among other things, attempting or threatening to transfer a biological agent or toxin.

C. Internet Postings

5. On January 18, 2006, a message was posted on www.drewsmiles.proboards17.com, a forum where fans for Drew

Barrymore are allowed to post information. The posting stated:

For 25 years I have wrongfully suffered a real chemical poison attacks from the secret government-now it is payback time. For the next 25 years I starting yesterday I did lauch the greatest terrorist attack on the OS since Sept 2001! Tell Drew Barrymore that I, Paul Steeves in Santa Cruz had expected her to peacefully contact me. Now its war.

6. This information was provided by the administrator of www.drewsmiles.proboards17.com. In order to post messages to this website, certain information is required. The individual who posted this message registered under the name "poisonstage," email "redding610@yahoo.com" and birthday "06/18/1962". This is the known birth date for Paul Charles Steeves. According to the administrator, the IP address associated with the posting revealed it was made at the Santa Cruz County Library. Using a visual trace route tool, Visualware, it was determined the server that hosts www.drewsmiles.proboards17.com is located in Houston, Texas.
7. At least four postings by "Paul Steeves" have been placed between December 29, 2005 and January 18, 2006 on the website of a band known as "The Strokes." One of the band members, Fabrizio Moretti, is Barrymore's boyfriend. One of the postings, dated January 18, 2006, states: "Drew Barrymore will get a big suprise January 16 unless she, or Fab contact me with peace and an open heart to listen. They will fucking pay if they don't." The posting, dated January 18, 2006, states: "Paul Steeves in Santa Cruz Ca here has had enough with no one be honest with me, so I've launched the greatest chemical terrorist attack on the US since Sept 11! Tell Drew Barrymore and Fab that they should have met me in peace. Now it is war..." Another posting, dated December 29, 2005, states: "Xorin Balbes of the Global Vision for Peace is guilty of using Drew Barrymore as a fashion show for advertising his fraudulant organization. Tell Fabrizio I'm coming after all of them. They have until Jan 16, 2006 to end this cancer causing silent treatment, or else a BIG suprise will show itself! An elite group of Masonic witches have control over the U.N....."
8. Three letters, all postmarked on January 16, 2006, and all containing an unknown white powder, were received by the organizations below.

D. Letters

9. Newbridge Foundation: On January 18, 2006, the Administrative Offices for Newbridge Foundation Residential Drug Rehabilitation Center in Berkeley, California, received a letter postmarked Oakland, California, on January 16, 2006. The envelope contained a white, powdery substance and a piece of paper signed "Paul Steeves" with pictures of actress Drew Barrymore, a picture showing a plane flying into the World Trade Center on 9-11, and handwritten and typewritten text which included references to Xorin Balbes and Muslims. The letter listed a return address of: XB 555 55 5, 1846 Grace Ave., LA, CA 90028. The individual who opened the letter noticed a white, powdery substance which spilled onto her hands causing her hands and arms to itch. The Albany Fire Department (AFD) and Albany Police Department (APD) responded to the scene and secured the letter. Members of the FBI's Hazardous Materials Response Team (HMRT) conducted field screening of the substance and then transported the letter to a laboratory for biological testing. Investigation revealed that a designer named Xorin Balbes, who resides in the Los Angeles area, was one of the individuals who launched Global Vision for Peace in 2003. Actress Drew Barrymore joined co-founders Xorin Balbes and Heath Cliff Rothman at the launch of "Artists for the U.N." at U.N. Headquarters where Barrymore was pinned as the inaugural "Friend of the U.N."
10. U.S. Probation: On January 18, 2006, the U.S. Probation Office in Oakland, California, received a letter postmarked Oakland, California, on January 16, 2006. The envelope contained a white, powdery substance and a letter that was identical to the one received by the Newbridge Foundation. The letter listed a return address of: "Zorin Fraud, 5419 Hollywood Blvd., Suite #C208, LA, CA 90027, 55y 5m 5-5-5-5 days." Federal Protective Services and the Oakland Fire Department responded to the scene and secured the letter. The FBI responded and transported the letter to a laboratory for biological testing. The Office Services Manager for the U.S. Probation Office in Oakland reported that Paul Steeves, who was supervised by the Oakland Probation Office after a 1997 conviction, sent a threatening letter to his former probation officer in 2004. The Oakland Probation Office also reported that they use the Newbridge Foundation in Berkeley as a rehabilitation center.
11. FBI: On January 19, 2006, the FBI Office in Watsonville, California, received a letter postmarked San Jose, California on January 16, 2006. The

envelope contained a white, powdery substance and two pieces of paper, one of them similar to the letters received by the Newbridge Foundation and the Oakland Probation Office, except for some additional handwritten text, including the words "in memory of supposedly [sic] dead" and "PAUL STEEVES DOB 6-18-62." The return address listed was: "Federal Agents? March 5, 2002? Berkeley, CA! 94777." Members of the FBI's HMRT conducted field screening of the substance then transported the letter to a laboratory for biological testing.

E. Investigation into Paul Steeves

12. Investigation revealed that Paul Charles Steeves has a history of contact with the FBI. On January 13, 1997, Steeves was sentenced in federal court in the Northern District of California to three years probation for threatening the life of a Watsonville, California FBI agent in 1996. Steeves was supervised by the U.S. Probation Office in Oakland, California. In 2004, Steeves sent a quasi-threatening letter to his former federal probation officer in Oakland, California. On October 27, 2005, a letter which mentions actress Drew Barrymore and Xorin Balbes was received via U.S. mail at the FBI Office in Watsonville, California. The letter bore the signature, "Paul Steeves."
13. On January 20, 2006, the Santa Cruz County Sheriff's Office and the FBI located Steeves as he approached his residence in Santa Cruz, California, on his bicycle. The Sheriff's Deputies detained Steeves and obtained permission to talk to him inside his residence and wait for the Santa Cruz Police Department. Once inside the residence, Steeves stated: "I'm glad you guys came because I was going to keep mailing those letters for the next 15 or 20 years." He called them protest letters. In plain view in Steeves' living room were magazine clippings of actress Drew Barrymore on the wall. Also in plain view on the floor in the middle of the room were several photocopies of pictures of Barrymore. Among those pictures on the floor were several versions of printed text signed at the bottom "PAUL C STEEVES." Some of these photocopies and cut out text are identical to the contents of letters received by the U.S. Probation Office in Oakland and the Newbridge Foundation in Berkeley. Also, in plain view, were several computers and computer disks.
14. After being advised of his Miranda rights, Steeves admitted that he had been interested in Drew Barrymore for about seventeen years, since 1988.

He stated that he chose her because he believed they had "common goals," despite the fact he had never met her. Steeves attempted to make personal contact with Barrymore via mail and email over the years, and became "frustrated" that she would not return his correspondence. Steeves admitted that he had posted the message on www.drewsmiles.proboards17.com (see Part C, above) out of frustration because Barrymore would not contact him.

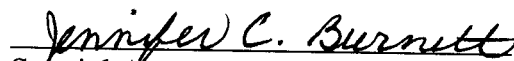
15. On January 20, 2006, officers executed a state search warrant at Steeves' residence in Santa Cruz. According to investigators with the Santa Cruz County Sheriff's Office, some of the items seized in the search include: a photo album of Drew Barrymore showing pictures of her from childhood through adulthood, a 2-pound bag of Arm & Hammer pure baking soda which was one-half to three-quarters empty, at least twelve sealed envelopes addressed to the FBI and miscellaneous letters to Drew Barrymore, and what appears to be the original letter used to create the copies that were sent to Newbridge and the U.S. Probation Office.

F. Conclusion

Based upon the foregoing, I submit that there is probable cause to believe that Paul Charles Steeves has violated Title 18, United States Code, Section 875(c) and Title 18, United States Code, Section 1038(a).

Subscribed and sworn to before me under penalty of perjury on the 23 of January, 2006, in San Francisco, California.


HON. JOSEPH C. SPERO
United States Magistrate Judge


Special Agent Jennifer C. Burnett
Federal Bureau of Investigation